

1 SPENCER P. HUGRET (SBN: 240424)  
2 [shugret@grsm.com](mailto:shugret@grsm.com)  
3 KATHERINE P. VILCHEZ (SBN: 212179)  
4 [kvilchez@grsm.com](mailto:kvilchez@grsm.com)  
5 GORDON REES SCULLY MANSUKHANI, LLP  
6 315 Pacific Avenue  
7 San Francisco, CA 94111  
8 Telephone: (415) 986-5900  
9 Facsimile: (415) 986-8054

10 Attorneys for Defendant  
11 FORD MOTOR COMPANY

12  
13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 KRISTY KOHNDROW an individual,

16 Plaintiffs,

17 vs.

18 FORD MOTOR COMPANY, a  
19 Delaware Corporation; and DOES 1  
20 through 10, inclusive,

21 Defendants.

Case No. 5:23-cv-04354-PCP

**DECLARATION OF KATHERINE  
P. VILCHEZ IN SUPPORT OF  
FORD MOTOR COMPANY'S  
OPPOSITION TO PLAINTIFF  
KRISTY KHONDROW'S MOTION  
FOR \$46,708.15 IN ATTORNEY'S  
FEES AND COSTS**

*[Filed with the Opposition and the  
Declaration of Hailey M. Rogerson]*

HEARING DATE: June 13, 2024  
TIME: 10:00 a.m.  
Dept.: 8

Sup. Ct. Comp. Filed: June 20, 2023  
Removed: August 24, 2023

Gordon Rees Scully Mansukhani, LLP  
315 Pacific Avenue  
San Francisco, CA 94111

1 I, Katherine P. Vilchez, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California  
3 and the United States District Court for the Northern District of California, and I am  
4 a partner at Gordon Rees Scully Mansukhani, LLP, attorney of record for Defendant  
5 Ford Motor Company (“Ford”). I am a member in good standing with the State Bar  
6 of California. I have personal knowledge of the following facts, except for those  
7 based on information and belief, which I believe to be true, and if called upon to  
8 testify, I could and would competently testify to their truth and accuracy.

9 2. This declaration is submitted in support of Ford’s Opposition to  
10 Plaintiff’s Motion for Attorney’s Fees and Costs.

11 3. Attached hereto as **Exhibit A** is a true and correct copy of Joseph  
12 Kaufman & Associates’ fee and cost invoice in this matter.

13 4. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff’s  
14 April 27, 2023, Demand Letter to Ford.

15 5. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff’s  
16 Complaint filed on July 20, 2023.

17 6. Attached hereto as **Exhibit D** is a true and correct copy Ford’s Rule 68  
18 Offer.

19 7. After the case was settled on February 7, 2024, Plaintiff waited until  
20 April 11, 2024 to provide a fee demand of \$26,760.15 in this matter. Attached hereto  
21 as **Exhibit E** is a true and correct copy of Plaintiff’s April 11, 2024, fee demand  
22 email.

23 8. On April 30, 2024, Plaintiff’s counsel increased their demand to  
24 \$31,339.65, adding the fees allegedly incurred for drafting the Fee Motion. Attached  
25 hereto as **Exhibit F** is a true and correct copy of Plaintiff’s April 30, 2024, fee  
26 demand email.

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I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct, and that this Declaration was executed on May 17, 2024, in Fair Oaks, CA.

By: /s/ Katherine P. Vilchez  
Katherine P. Vilchez